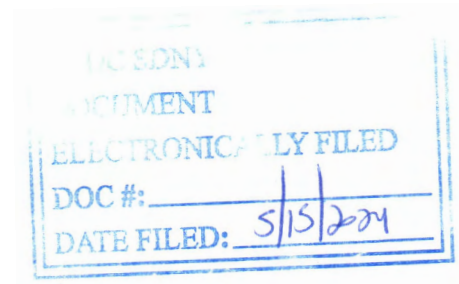


Higbee & Associates

A NATIONAL LAW FIRM

May 15, 2024
LETTER
FILED VIA ECF



Hon. Judge Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street, Room 2550
New York, New York 10007

RE: Tamara Wareka p/k/a Tamara Williams v. Beauty Pro NYC Inc, et al.
Case 1:24-cv-02025-CM
Letter Motion to Adjourn Scheduling Conference

OK, conference adjourned.

Dear Judge McMahon,

RECEIVED
JUL 1 2024

Colleen McMahon
5/15/2024

Pursuant to Rule I.D and V.E(1) of Your Honor's Individual Practices, I write this letter to request an adjournment of the Initial Scheduling Conference, currently set for May 23, 2024.

Plaintiff Tamara Williams filed this action on March 18, 2024. Defendant was served via the New York Secretary of State on April 23, 2024 and their Answer was due on May 14, 2024. *See* Dkt. #11. The time for Defendant to respond to the Complaint has passed. Defendant has not made a formal appearance in this matter, has not reached out to Plaintiff to request an extension or to resolve this claim, and has not responded to the Complaint in the time proscribed the Federal Rules of Civil Procedure.

Because Defendant has not appeared or contacted Plaintiff or Plaintiff's counsel, Plaintiff has been unable to meet and confer with Defendant to complete the Civil Case Management Plan requested by the Court as Docket Entry #9. Moreover, because Defendant has not responded, Plaintiff cannot clearly ascertain what potential scheduling issues may exist as Plaintiff has no notice of Defendant's defenses to this action.

Plaintiff intends to move for an entry of default judgment. Your Honor's Individual Rule V.E(1) requires that Plaintiff wait 30 days from the time of service to allow for the receipt of an appearance by mail from Defendant before Plaintiff can move forward with default proceedings. Based on the date of service, and Your Honor's Individual Rules, Plaintiff will be able to move for default as early as May 23, 2024.

In light of the good cause established above, I respectfully request that the Court grant the requested adjournment of the Initial Scheduling Conference. This is Plaintiff's first request for an adjournment and no other dates are affected by the requested adjournment.

Sincerely,

/s/Taryn Rose Murray
Taryn Rose Murray, Esq.
Attorney for Plaintiff